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Attorneys for Defendants, Corizon Health, Inc., Joseph
McCarthy, MD, Colin Storz, Leslie O'Neil, CJ Buchanan,
Louisa Duru, Molly Johnson, and Courtney Nyman

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

RUSSELL PITKIN and **MARY PITKIN**,
Co-Personal Representatives of the Estate of
MADALINE PITKIN, Deceased,

Plaintiffs,

vs.

CORIZON HEALTH, INC., a Delaware
Corporation; **CORIZON HEALTH, INC.**,
a Tennessee Corporation; **WASHINGTON
COUNTY**, a government body in the State
of Oregon; **JOSEPH MCCARTHY, MD**,
an individual; **COLIN STORZ**, an
individual; **LESLIE O'NEIL**, an individual;
CJ BUCHANAN, an individual; **LOUISA
DURU**, an individual; **MOLLY
JOHNSON**, an individual; **COURTNEY
NYMAN**, an individual; **PAT GARRETT**,
in his capacity as Sheriff for Washington
County; **JOHN DOES 1-10**; and, **JANE
DOES 1-10**,

Defendants.

Case No. 3:16-cv-02235-AA

**CORIZON HEALTH, INC.'S RESPONSE
TO PLAINTIFFS' FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

REQUEST NO. 1: Copies of all contracts and subsequent amendments between defendants Washington County and Corizon Health, Inc., and its predecessor Prison Health Services, relating to the providing of medical care at the Washington County Jail.

RESPONSE TO REQUEST NO. 1: Documents being provided.

REQUEST NO. 2: Copies of all policy manuals, procedures, protocols, guidelines, and any other materials in any form concerning the providing of medical care at the Washington County jail, specifically the policies and procedures tailored to the Washington County jail as required by the National Commission on Correction Healthcare standards, to which healthcare personnel were expected to adhere, including but not limited to: opioid withdrawal, use of IV's, transportation of patients to local hospitals and/or emergency rooms, COWS assessment, and charting.

RESPONSE TO REQUEST NO. 2: Corizon Health, Inc. is producing the policies and procedures manual(s) in place in April 2014.

REQUEST NO. 3: Copies of any and all documentation relating to the sentinel Event Review Committee and the Sentinel Event investigation, its findings and recommendations compiled in the aftermath of Madaline Pitkin's death.

RESPONSE TO REQUEST NO. 3: Objection. Subject to attorney client privilege and protected by ORS 41.675.

REQUEST NO. 4: Copies of the personnel files of all medical personnel who had any contact with Madaline Pitkin while in the Washington County jail.

REQUEST NO. 32: Copies of all policies of liability and indemnity insurance applicable to plaintiffs' claims.

RESPONSE TO REQUEST NO. 32: Corizon's insurance policies in effect at the time of Pitkin's death are being provided.

Dated this 5th day of April, 2017.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

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